

1 Chad C. Butterfield, Esq.  
Nevada Bar No. 010532  
2 **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
300 South Fourth Street, 11th Floor  
3 Las Vegas, Nevada 89101  
(702) 727-1400; FAX (702) 727-1401  
4 [chad.butterfield@wilsonelser.com](mailto:chad.butterfield@wilsonelser.com)  
*Attorneys for Defendant*  
5 **AMERICAN HONDA FINANCE CORPORATION**

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 TERRY L. SHIRLEY,

9 Plaintiff,

10 v.

11 DITECH FINANCIAL LLC, SCE FEDERAL  
CREDIT UNION, TARGET NATIONAL  
12 BANK, AMERICAN HONDA FINANCE  
CORPORATION, UNITED SERVICES OF  
13 AMERICA FEDERAL CREDIT UNION,  
INNOVIS DATA SOLUTIONS, INC. d/b/a  
14 INNOVIS, EQUIFAX INFORMATION  
SERVICES, LLC, TRANSUNION, LLC AND  
15 EXPERIAN INFORMATION SOLUTIONS,  
INC.,

16 Defendants.  
17

Case No.: 2:18-cv-01605-RFB-VCF

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING TO  
PLAINTIFFS COMPLAINT**

**(First Request)**

18 Defendant, AMERICAN HONDA FINANCE CORPORATION (hereinafter "AHFC"), by  
19 and through its counsel of record, CHAD C. BUTTERFIELD, ESQ., of the law firm WILSON,  
20 ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, and Plaintiff, TERRY L. SHIRLEY, by and  
21 through his counsel of record, MICHAEL KIND, ESQ. of the KAZEROUNI LAW GROUP, APC  
22 hereby stipulate and agree to extend the deadline for filing a responsive pleading to November 12,  
23 2018.

24 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
25 requested extension, as counsel for AHFC has only recently been retained to represent AHFC in this  
26 matter and has only recently obtained the relevant file materials and information necessary to respond  
27 to the allegations set forth in the Complaint. Accordingly, the parties agree that the requested  
28

1 extension furthers the interests of this litigation and is not being requested in bad faith or to delay  
2 these proceedings unnecessarily.

3 This is the parties' first request for extension of the deadline.

4 DATED this 30<sup>th</sup> day of October, 2018.

5 **WILSON, ELSE, MOSKOWITZ,**  
6 **EDELMAN & DICKER LLP**

7 /s/ Chad C. Butterfield

8 Chad C. Butterfield, Esq.  
9 Nevada Bar No. 10532  
10 300 South Fourth Street, 11<sup>th</sup> Floor  
11 Las Vegas, NV 89101  
12 *Attorneys for Defendant American Honda*  
13 *Finance Corporation*

14 DATED this 30<sup>th</sup> day of October, 2018.

15 **KAZEROUNI LAW GROUP, APC**

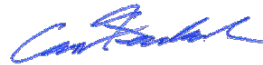
16 /s/ Michael Kind

17 Michael Kind, Esq.  
18 Nevada Bar No. 9806  
19 6069 South Fort Apache Rd., Suite 100  
20 Las Vegas, NV 89148  
21 *Attorney for Plaintiff Terry L. Shirley*

22 **ORDER**

23 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

24 Dated this 31st day of October, 2018.

25 

26 UNITED STATES MAGISTRATE JUDGE